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RECEIVED

Magalie Roman Salas Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

JAN 1 5 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: 2001-Fourth Quarter Status Report - E911 TTY Implementation,
Triton PCS, Inc. and Triton PCS License Company, L.L.C.,
<u>CC Docket No. 94-102</u>

Dear Ms. Salas:

Pursuant to the Federal Communications Commission's Fourth Report and Order in CC Docket 94-102 ("Fourth R&O"), this letter provides a status report on the efforts by Triton PCS, Inc. and its licensee subsidiary Triton PCS License Company, L.L.C. (collectively "Triton") to implement E911 TTY compatibility on Triton's commercial wireless services networks. In the Fourth R&O, the Commission requested that carriers provide reports by the fifteenth of the month following the end of each calendar quarter detailing certain development, testing, and deployment activities. This letter is Triton's fourth E911 TTY report and it covers activity during the fourth quarter of 2001.

Triton holds PCS licenses for markets in portions of North Carolina, South Carolina, Virginia, Kentucky, West Virginia, Georgia, and Tennessee. Across all these markets, Triton's network utilizes LM Ericsson Telephone Co. ("Ericsson") TDMA infrastructure equipment. As a result, Triton is entirely dependent on Ericsson's development of TTY solutions that can be integrated into Triton's existing network.

During this quarter, Triton has completed its necessary upgrade to Generic Version 7 for all of its existing Ericsson TDMA switches. This generic upgrade will support Ericsson's Test Telephone (TTY) feature when it becomes available. The next phase in Triton's TTY solution implementation involves the installation of the actual Ericsson TTY feature when it becomes available.

Ericsson provided Triton with updated information regarding the status of its TTY/TDMA product development. Ericsson reported to Triton that it completed a first order applications (FOA) trial with a major TDMA carrier in November 2001. Ericsson

reported that they successfully demonstrated the Ericsson TTY solution both in the lab and in the field for mobile-to-landline calls, mobile-to-mobile calls, and mobile-to-TRS calls with several vendors' TTY devices and mobile stations. Although the results of this trial were generally successful, there remain two significant action items outstanding. The outstanding action items involve issues with mobile-to-live PSAP testing and interoperability with a single mobile phone vendor. Ericsson has indicated to Triton that it is continuing its efforts to resolve these outstanding issues with its TTY solution, but is unable to supply a timeframe for availability of a generally available (GA) TTY solution at this time.

As a result of Triton's direct dependence upon Ericsson as its infrastructure vendor, and despite Ericsson's efforts to offer a timely TTY solution, Triton has been unable to obtain all of the necessary software upgrades and equipment necessary to its switching platform to meet the December 31, 2001 deadline. Therefore, to the extent the Commission deems it necessary, Triton requests that the Commission consider this TTY report as a request for waiver of the December 31, 2001 requirement.[1]

With respect to TTY handset availability, Triton does not manufacture handsets, and accordingly, must rely upon the efforts of the various handset manufacturers that develop and sell TTY compatible TDMA handsets. Nonetheless, as detailed below, Triton has obtained a TTY compatible handset model from one of its vendors. Until such time as Ericsson's TTY feature is available and can be installed in Triton's network, however, Triton cannot test any manufacturer's handsets to evaluate their compatibility with TTY software and network operations.

In establishing its quarterly reporting requirement, the Commission requested that reporting carriers provide specific information on the following "milestones" and issues:

Development Activities

1.   **Network Infrastructure Software Development.** As outlined above, Ericsson is Triton's infrastructure vendor across Triton's entire network and Triton

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[1] The Commission's December 31, 2001 deadline is not actually part of Section 20.18(c) of the current rules. The December 31, 2001 date originated in Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, 15 FCC Rcd 25216 (2000), where the FCC required carriers operating digital wireless systems to obtain all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices by December 31, 2001, but allowed carriers an additional six months to integrate, test and deploy technology in their systems in conjunction with the public safety community. To the extent that the FCC considers itself bound by its previously announced December 31, 2001 deadline, Triton PCS hereby requests that that deadline be waived as to Triton PCS.

remains in constant contact with Ericsson on TTY development issues. Ericsson has reported to Triton the following:

- First Order Application (FOA) testing of Ericsson TTY infrastructure software with a major TDMA carrier was completed in November 2001.

- The timing of General Availability of software has not been indicated by Ericsson at this time, due to outstanding unresolved issues surrounding the FOA.

2.   **Handset Development and Testing Plans.** Handset development and testing is the responsibility of Triton's handset vendors/manufacturers. As indicated above, Triton does not manufacture any handsets itself and must rely on the handset vendor's TTY development efforts. At this time, Triton has available to it one TTY compatible handset model from one of its three main handset vendors. The handset is a model manufactured by Panasonic which Triton plans to stock in all of its retail locations. When Ericsson resolves its outstanding issues with its TTY feature, as outlined above, and TTY software can be installed on Triton's network, Triton will begin testing the one TTY compatible handset model available to it. Triton's other vendors still are developing their TTY complaint models for release, and Triton currently does not have any "test" models for these other vendors at this time.

3.   **Beta Testing and Lab Testing.** This testing will be completed by the handset vendors rather than carriers such as Triton. As detailed above, Ericsson has completed preliminary lab testing for its TTY software.

4.   **Release and General Availability to Carriers of Network Infrastructure Software.** Triton will make use of Ericsson's TTY feature network infrastructure software as soon as it is available commercially.

5.   **Availability to Carriers of Full Acceptance Test Units.** Triton currently has available to it one TTY compatible handset model from Panasonic, one of its three main handset vendors. Triton's other vendors still are developing their TTY compatible models for release, and Triton does not have any "test" models for these vendors at this time. Testing will commence after Ericsson's TTY feature is available commercially.

6.   **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY Devices.** These efforts are directly dependent on the efforts of Triton's infrastructure vendor, Ericsson, and upon Triton's handset vendors. After the necessary Ericsson TTY feature is installed, Triton will take all steps within its control to comply with utilization of enhanced TTY devices that are compatible with the Ericsson TDMA platform that makes up its current network.

Testing and Deployment Activities

     7.   Carrier coordination of testing with PSAP. Triton intends to utilize its existing relationships with PSAPs to facilitate testing of TTY compatibility with E911 communications after the necessary Ericsson TTY feature is available.

     8.   Carrier Testing Activities, Including Field Testing, Consumer End-To-End Testing, And Other Necessary Tests. Until such a time as the necessary TTY feature becomes available, Triton can only develop a thorough test plan to ensure full compliance with TTY compatibility requirements. Once the necessary software has been installed, Triton will conduct tests to ensure achievement of TTY compatibility requirements.

     9.   Retail Availability Of Necessary Consumer Equipment. When TTY compatible consumer equipment becomes available, and after Triton thoroughly tests the consumer equipment, Triton will utilize its established chain of retail outlets, its Internet website and all other marketing sources to make TTY compatible equipment available to interested subscribers.

     10.   Geographic Scope Of Network Infrastructure Deployment. Triton intends to deploy TTY support capability and compatibility in its entire network once the necessary TTY feature switch software is available from Ericsson, and adequate testing has taken place to ensure that the requirements of TTY compatibility are met. Triton cannot provide a date certain on which each of these implementation milestones will be achieved, however, it will continue to monitor the events that must occur prior to Triton's ability to test TTY performance on its network and will continue to report progress as required by the Commission.

     Should any questions arise or if there is need for further information concerning this Triton status report or Triton's TTY implementation, please contact the undersigned at (202)-776-2824.

Respectfully submitted,

Laura Phillips

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Counsel for Triton PCS, Inc.

cc: Glen Robinson – Senior Vice President, Engineering and IT
            Patrick Forster, Wireless Telecommunications Bureau
            Mindy Littell, Wireless Telecommunications Bureau